



127152



LISA P. JACKSON
Commissioner

May 10, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

**Twin Anchors Marine Basin
c/o Claire Ludwig
PO Box 9
12 Liberty St.
Fords, NJ 08863**

Dear Ms. Ludwig:

RE: Margarets Creek Contamination, Route 35, Old Bridge Twp., Middlesex Co., New Jersey
SRP PI: 434324

The New Jersey Department of Environmental Protection (Department) is charged with responding to the release or threatened release of hazardous substances and with the enforcement responsibilities under the Spill Compensation and Control Act (N.J.S.A. 58:10-23 et seq.). The Department has documented the release of hazardous substances at the above referenced site, located at Block 1 Lots 54.11 and 54.12, Old Bridge Twp., Middlesex Co., New Jersey. Investigative findings indicate that Twin Anchors Marine Basin owned the property at the time waste materials containing hazardous substances were disposed of at the site.

The enclosed "Request for Information" has been sent to you for your response relative to the activities of Twin Anchors Marine Basin at the subject site. Your response to the "Request for Information" should be postmarked, or received at the below address within fifteen (15) calendar days of your receipt of this letter. The response should be mailed to my attention at the following address:

**NJDEP/Division of Remediation Support
Responsible Party Investigations Unit
PO Box 028
Trenton, NJ 08625-0028**

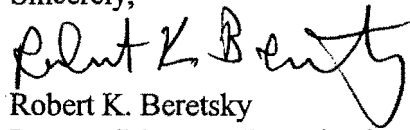
Your notarized signatures must appear on the enclosed "Certification of Answers to Request for Information", which is to be submitted with the response. Please familiarize yourself with the "Instructions for Responding to Request for Information" and adhere to its guidance in responding. Failure to respond to the "Request for Information" may result in the initiation of enforcement

proceedings and the issuance of an Administrative Subpoena (N.J.S.A. 26:1A-47 and N.J.S.A. 13:1D-7.a).

If at any time in the future you have additional information and/or find that any aspect of the submitted information is false, misleading, or misrepresents the truth, you must notify the Department accordingly. Failure to so amend the response may be construed as concealment.

Should you have questions regarding this letter or the proper procedures for completion of the "Request for Information" you may contact me at 609-633-1165. Your anticipated cooperation in this matter is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert K. Beretsky", written over the typed name.

Robert K. Beretsky
Responsible Party Investigations Unit

Enclosure
c: File

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

1. A separate response should be given for each question.
2. Precede each answer with the number of the question to which it is addressed.
3. In answering each question, identify all contributing sources of information.
4. Interpret "and" as well as "or" to include within the scope of the question as much information as possible. If two interpretations of a question are possible, use the one that provides more information.
5. Interpret the terms spill, release and/or discharge to include any intentional or unintentional act or omission resulting in the releasing, spilling, leaking, pumping, pouring, emitting, emptying, dumping or disposal of hazardous substances onto the lands or into waters of the State.
6. If you are unable to give a detailed and complete answer or to provide any of the information or documents requested, indicate the reason for your inability to do so.
7. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any questions, state that person's name, address, phone number, and the reasons for your belief.
8. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the document with their addresses.
9. For each document produced in response to the "Request for Information", indicate on the document, or in some other reasonable manner, the question to which it applies.
10. If anything is omitted from a document produced in response to the "Request for Information", state the reason for and the subject matter of the omission.
11. If you cannot provide a precise answer to a question, you may approximate, but in any such instance, state the reason why you cannot be more specific.
12. For each individual identified, provide their full name, last known employment, permanent home address and telephone number.

NJDEP REQUEST FOR INFORMATION
SITE: MARGARETS CREEK LEAD CONTAMINATION
ROUTE 35
OLD BRIDGE TWP., MIDDLESEX COUNTY

1. State the correct name(s) of Twin Anchors Marine Basin and identify any other name(s) under which it has done business. Specify all names under which Twin Anchors Marine Basin conducted business activities at the subject site.
 - a. If the company(ies) identified above are or were subsidiaries or affiliates of other corporations or have subsidiaries, identify these related companies.
 - b. Specify the type of organization (corporation, limited partnership, general partnership, proprietorship, joint venture) for each company identified in questions 1 and 1a. As appropriate, identify the state of incorporation or county of registration, and current status for each company identified in questions 1 and 1a.
 - c. State the names, titles, current addresses, and telephone numbers for all past and present officers, partners, managers, etc. of each company identified in Questions 1 and 1a. Provide the exact dates these individuals served as officers, partners, managers, etc. at the subject site.

NOTE: Hereinafter the name Twin Anchors Marine Basin shall apply to all entities identified in questions 1 and 1a.

2. Indicate the exact dates Twin Anchors Marine Basin owned the subject site.
 - a. Provide copies of all deeds, contracts, permits, licenses, agreements, leases, etc. that relate to Twin Anchors Marine Basin' ownership of the site.
3. In detail, describe all activities and operations conducted at the site during Twin Anchors Marine Basin's ownership.
4. Did Twin Anchors Marine Basin lease, rent, or permit other parties to operate at, or otherwise utilize the subject site at any time from 1930 to date? Provide the following information for each lessee, tenant, occupant, operator, etc.:
 - a. Provide copies of all contracts, permits, licenses, agreements, leases, etc. and indicate the effective dates of each.
 - b. Specify the exact dates each tenant leased, rented or occupied the site.
 - c. Describe the activities (processes, operations, waste disposal/handling practices) undertaken by each lessee, occupant, tenant, operator, etc. at the site.

5. Identify and describe all current and former areas of environmental concern on the property. Areas of environmental concern are defined as any location where hazardous wastes, hazardous substances or pollutants were handled, stored, treated, conveyed, discharged or disposed of and sensitive locations potentially impacted by discharges or releases of hazardous wastes, hazardous substances or pollutants. Specific areas of concern include, but should not be limited to: structures, buildings, above and below ground tanks, pipes (above and below ground), above and below ground containment/storage vessels, storage areas, wells, floor drains/troughs, cesspools, leach pits, septic tanks/disposal fields, parts cleaning/washing stations, sumps, disposal areas (landfills, landfarms, spray fields, etc.), pits, lagoons/impoundments, drainage troughs/swales/culverts, dry wells, chemical loading/off-loading areas, visibly stained/discolored soils, areas of dead or stressed vegetation, discharge locations/outfalls, etc.. Identify each area of concern on a scaled site plan. Provide the following information for each area of concern as appropriate:
 - a. The uses and functions of each area of concern.
 - b. The dates each area of concern was constructed/installed. Identify the person(s) responsible for construction/installation of each area of concern.
 - c. Specify the materials of construction (concrete, steel, fiberglass, etc.) and rated capacity of each area of concern.
 - d. Identify materials handled, processed, stored, disposed of, etc. in each area of concern.
 - e. Specify the current status of each area of concern. Identify all person(s) responsible for the removal, demolition, excavation, disposal, etc. of each area of concern that have been removed, demolished, excavated or otherwise rendered inoperable. Provide copies of all reports, permits, certifications, approvals, etc. relating to the demolition, excavation or disposal of each area of concern.
6. Provide a detailed history of landfilling/disposal activities at the site. Include the exact dates the landfilling/disposal activities were conducted, the name(s) of the operator(s) of the landfill/disposal activities and the names of the property owner(s) at the time landfilling/disposal activities were conducted.
7. Identify the source(s)/origin(s) of all waste/fill material disposed of at the subject site. Provide the name, current or last known address and telephone number of each source. Describe the waste/fill materials from each source by including the following information:
 - a. Describe the processes/operations from which the fill/waste materials were generated.

- b. Identify all raw materials, catalysts, products, feed stocks, etc. used for each activity and process as described in Question 7a. Provide the proper chemical name, CAS number, trade name (if applicable), and hazardous characteristics (ie. explosive, flammable, toxic, radioactive, etc.) for each substance identified above.
 - c. Identify all off spec products, spent materials (catalyst, feed stock, etc.), by products, waste materials, etc. generated from each activity and process described in Question 7a. Provide a description of each off spec product, spent material, by product, waste material, etc. including color, texture, physical state, (solid, liquid, gas, sludge, etc.), odor, known or probable chemical constituents, and hazard characteristics (ie. explosive, flammable, toxic, radioactive, etc.). Indicate whether any of the waste material shipped to the subject site was a hazardous waste as defined by N.J.A.C. 7:26-8 and/or contained hazardous substances as defined by N.J.S.A. 58:10-23.11 et seq. Identify any specific hazardous substances that you have reason to believe were in any materials disposed of at the subject site.
 - d. Indicate the total quantity of fill/waste material disposed of at the site by each source identified in question 7.
8. Provide the name(s), current or last known address(es), and telephone number(s) of all persons that transported waste/fill material to the subject site. Provide copies of all disposal tickets, trip tickets, manifests, shipping papers, bills of lading, receipts, etc. for each waste shipment transported to the site.
9. Provide a chronological history of known spills/releases/ discharges at the site from 1930 to date. Provide the following information for EACH spill/release/discharge:
- a. Provide a description of each incident including duration, location, substances involved and quantity of material spilled/released/discharged.
 - b. Indicate whether the NJDEP Environmental Hotline, the USEPA, or other agencies (health department, fire department) was notified of the spill/release/discharge. Provide the case/incident number assigned to each spill/release/discharge.
 - c. Describe remedial activities undertaken to address each spill/release/discharge.
 - d. To the best of your ability, identify the party(ies) responsible for each spill/release/discharge. Provide documentation supporting why each party is considered responsible.

10. To the best of your ability, identify and describe all activities conducted at the site prior and subsequent to Twin Anchors Marine Basin's tenancy/ownership.
11. Submit the names of all representatives, employees, or contractors of Twin Anchors Marine Basin who have knowledge of operations at the subject site. Identify each such person or company by name, address and telephone number. Include their job title, a description of their responsibilities, and the years they were associated with or employed by Twin Anchors Marine Basin.
12. Provide copies of all reports relating to the subject property. Specific documents requested include, but should not be limited to: internal inspection reports; regulatory compliance inspection reports; contractor generated reports; reports regarding the renovation, expansion or demolition of on-site structures; and all analytical data collected to date.
13. To the best of your ability, describe any relationship the following individuals or companies have had with the subject site. Provide the current or last known address (es) and telephone number(s) for each:
 - a. NL Industries
 - b. Liberty Trucking Company
 - c. Stardrive, Inc.
 - d. Lebar Co., Limited
 - e. Cifelli Associates
 - f. Almasi
14. Identify all other individuals who have knowledge of the facts relating to the disposal of any waste material at the subject site. For each individual identified include their name, current or last known address(es) and telephone number(s).
15. Identify all persons with whom Twin Anchors Marine Basin has discussed the release or threatened release of hazardous substances at the site. Include the nature of any such discussions.
16. State whether there exists any agreement or contract (other than an insurance policy) which may indemnify Twin Anchors Marine Basin or its past and present officers against any liability that may result under the New Jersey Spill Compensation and Control Act for any release or threatened release of hazardous substances that may have occurred at the subject site. If so, please provide a copy of the agreement or contract. Identify any agreement or contract that you are unable to locate or obtain.
17. State whether an insurance policy has ever been in effect which may indemnify Twin Anchors Marine Basin or its past and present officers against any liability that may result under the New Jersey Spill Compensation and Control Act for any release or threatened release of hazardous substances that may have occurred at the subject site. If so, please provide a copy of the policy. Identify any policy that you are unable to locate

or obtain by the name of the carrier, years in effect, nature of coverage and related information.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

STATE OF _____

COUNTY OF _____

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to NJDEP, Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (PRINT OR TYPE)

TITLE (PRINT OR TYPE)

SIGNATURE

SWORN BEFORE ME THIS _____
DAY OF _____, 20 _____

NOTARY PUBLIC